

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MAJED KHALIL,

Plaintiff,

v.

FOX CORPORATION, *et al.*

Defendants.

Case No. 1:21-cv-10248-LLS

**DECLARATION OF DEVIN S.
ANDERSON IN SUPPORT OF FOX
CORPORATION, FOX NEWS
NETWORK LLC, AND LOU DOBBS’
MOTION TO DISMISS**

I, Devin S. Anderson, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Partner of the law firm of Kirkland & Ellis LLP, counsel for defendants Fox Corporation, Fox News Network LLC, and Lou Dobbs in the above-captioned matter. I submit this declaration in support of Fox Corporation, Fox News Network LLC, and Lou Dobbs’ Motion to Dismiss. I am over 18 years of age. I have personal knowledge of the facts in this declaration, and I am competent to testify to the facts set forth below.

2. **Exhibit 1** is a true and accurate copy of a transcript of the December 10, 2020 broadcast of *Lou Dobbs Tonight*, as downloaded from the LexisNexis database.

3. **Exhibit 2** is a true and accurate copy of a November 28, 2020 Washington Post article titled “20 Days of Fantasy and Failure: Inside Trump’s Quest to Overturn the Election,” as downloaded from the Westlaw database.

4. **Exhibit 3** is a true and accurate copy of a November 30, 2020 Washington Post article titled “Prosecutors Demanded Records of Sidney Powell’s Fundraising Groups As Part of Criminal Probe,” as downloaded from the Westlaw database.

5. **Exhibit 4** is a true and accurate copy of a November 17, 2020 Associated Press article titled “Smartmatic Does Not Own Dominion Voting Systems,” as downloaded from the Associated Press’s website.

6. **Exhibit 5** is a true and accurate copy of a November 20, 2020 Wall Street Journal article titled “Georgia Certifies: Donald Trump Lost,” as downloaded from the LexisNexis database.

7. **Exhibit 6** is a true and accurate copy of a December 22, 2020 Washington Post article titled “Trump Assembles a Ragtag Crew of Conspiracy-Minded Allies in Flailing Bid to Reverse Election Loss,” as downloaded from the Westlaw database.

8. **Exhibit 7** is a true and accurate copy of a December 22, 2020 Washington Post article titled “Republicans Plunge into Open Battle over Trump’s Loss to Biden,” as downloaded from the Westlaw database.

9. **Exhibit 8** is a true and accurate copy of a transcript of the November 12, 2020 broadcast of *Lou Dobbs Tonight*, as downloaded from the LexisNexis database.

10. **Exhibit 9** is a true and accurate copy of a transcript of the November 13, 2020 broadcast *Lou Dobbs Tonight*, as downloaded from the LexisNexis database.

11. **Exhibit 10** is a true and accurate copy of a Lexitas transcript of the November 14, 2020 broadcast of *America’s News HQ, FOX NEWS*.

12. **Exhibit 11** is a true and accurate copy of a transcript of the November 14, 2020 broadcast of *Justice with Judge Jeanine*, as downloaded from the LexisNexis database.

13. **Exhibit 12** is a true and accurate copy of a transcript of the November 15, 2020 broadcast of *Sunday Morning Futures*, as downloaded from the LexisNexis database.

14. **Exhibit 13** is a true and accurate copy of a transcript of the November 16, 2020 broadcast of *Lou Dobbs Tonight*, as downloaded from the LexisNexis database.

15. **Exhibit 14** is a true and accurate copy of a transcript of the November 17, 2020 broadcast of *Lou Dobbs Tonight*, as downloaded from the LexisNexis database.

16. **Exhibit 15** is a true and accurate copy of a transcript of the November 19, 2020 broadcast of *Lou Dobbs Tonight*, as downloaded from the LexisNexis database.

17. **Exhibit 16** is a true and accurate copy of a Lexitas transcript of the November 19, 2020 broadcast of *America's Newsroom*.

18. **Exhibit 17** is a true and accurate copy of a transcript of the November 19, 2020 broadcast of *Tucker Carlson Tonight*, as downloaded from the LexisNexis database.

19. **Exhibit 18** is a true and accurate copy of a transcript of the November 20, 2020 broadcast of *Tucker Carlson Tonight*, as downloaded from the LexisNexis database.

20. **Exhibit 19** is a true and accurate copy of a transcript of the November 20, 2020 broadcast of *Mornings with Maria*, as downloaded from the LexisNexis database.

21. **Exhibit 20** is a true and accurate copy of a transcript of the November 21, 2020 broadcast of *Watters World*, as downloaded from the LexisNexis database.

22. **Exhibit 21** is a true and accurate copy of a transcript of the November 22, 2020 broadcast of *Mornings with Maria*, as downloaded from the LexisNexis database.

23. **Exhibit 22** is a true and accurate copy of a transcript of the December 13, 2020 broadcast of *Sunday Morning Futures*, as downloaded from the LexisNexis database.

24. **Exhibit 23** is a true and accurate copy of a transcript of the December 18, 2020 broadcast of *Lou Dobbs Tonight*, as downloaded from the LexisNexis database.

25. **Exhibit 24** is a true and accurate copy of a November 22, 2007 Miami Herald article titled “In Miami, Venezuela Means Big Money,” as downloaded from the Westlaw database.

26. **Exhibit 25** is a true and accurate copy of an October 7, 2020 publication by the Atlantic Council titled “The Maduro-Hezbollah Nexus: How Iran-backed Networks Prop Up the Venezuelan Regime,” as downloaded from the Atlantic Council’s website.

27. **Exhibit 26** is a true and accurate copy of a TransPerfect translation of an August 19, 2021 Infobae article titled “El Jefe de la Delegación de Maduro en México.” The original article is located at <https://bit.ly/3G8UEuu>.

28. **Exhibit 27** is a true and accurate copy of a TransPerfect translation of a November 19, 2015 Infobae article titled “La Casa Militar Venezolana Custodió el Viaje de la Droga de los Sobrinos de Nicolás Maduro.” The original article is archived at <https://archive.ph/XNGST>.

29. **Exhibit 28** is a true and accurate copy of a TransPerfect translation of a November 30, 2015 Diario Las Américas article titled “Derecho a Réplica de los Hermanos Khalil.” The original article is located at <https://bit.ly/3r46d1K>.

30. **Exhibit 29** is a true and accurate copy of a January 24, 2021 opinion piece in the Washington Post titled “Fox News Is a Hazard to Our Democracy,” as downloaded from the Westlaw database.

31. **Exhibit 30** is a true and accurate copy of a video recording of the December 10, 2020 broadcast of *Lou Dobbs Tonight*.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 31, 2022



Devin S. Anderson

CERTIFICATE OF SERVICE

The foregoing Declaration in Support of Defendants' Motion to Dismiss and annexed exhibits were served electronically on all counsel of record in this matter via the Court's ECF system, except for Exhibit 30, which was served electronically on all counsel of record via email, as agreed to by the parties.

/s/Robert W. Allen
Robert W. Allen